Exhibit A

Exhibit A

'194 Patent, claim 25

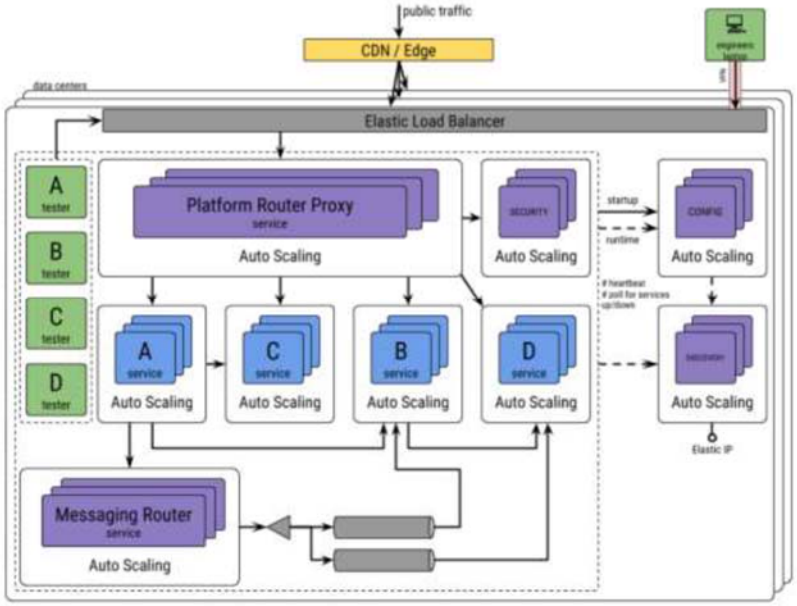
Claim Element	Allegations in the Complaint	Alleged Actors in the Complaint
25. An apparatus for providing recruitment information, comprising:	Paragraph 52-54 of the Complaint: 52. The Accused Instrumentalities comprise an apparatus for providing recruitment information. The infringing apparatus comprises servers, hardware, software, and a collection of related and/or linked web pages and mobile applications for providing recruitment information and services to individuals (including individuals, independent contractors, temporary workers, and/or freelancers) in the United States. On information and belief, the Accused Instrumentalities comprise an apparatus with multiple interconnected infrastructures, including but not limited to multiple data centers, including Amazon Web Services ("AWS") data centers located across the United States. Further on information and belief, Grubhub[1] employs multiple redundant data centers to withstand localized outages. I'll add that on a technical level, we're a service oriented platform that primarily operates out of multiple AWS data centers (regions) and are continually reducing our reliance on our own data centers and the monoliths they house (not much relies on them today). All the while, we continue to grow, acquire, integrate third parties, work with partners, and add functionality our customers want.	Grubhub

[1] Grubhub does not capitalize the "H" in its name. When quoting Plaintiff's allegations in these charts and the accompanying Motion to Dismiss, Defendant has corrected that spelling error.

2. Build on a public cloud. We chose AWS while making efforts to minimize lock-in.

3. Multiple hot datacenters to withstand localized outages and network problems.

See https://bytes.grubhub.com/cloud-infrastructure-at-grubhub-94db998a898a



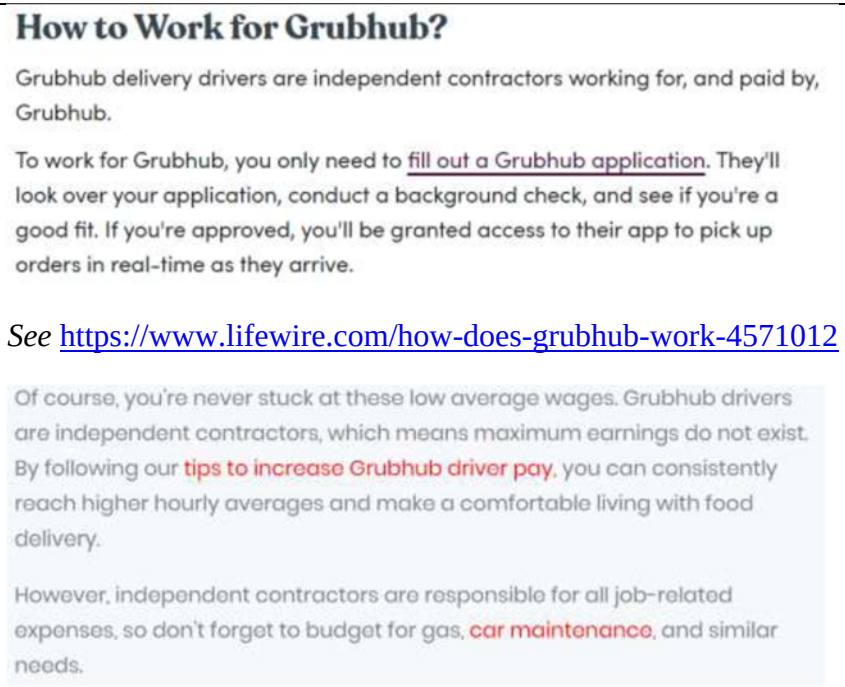
1. Docker — We containerize all services, testers and utilities. It's our standard unit of deployment.

2. Netflix Eureka — Provides service discovery within a platform instance (it's the discovery service on the diagram above).

3. Apache Cassandra — As mentioned above, this is our standard store for persistent data.

4. Elasticsearch — Used by a number of services that require search and more complex querying capabilities.

	See https://bytes.grubhub.com/cloud-infrastructure-at-grubhub-94db998a898a 53. On information and belief, the infringing Grubhub apparatus comprises Apache Cassandra as a primary data store. See: https://bytes.grubhub.com/cloud-infrastructure-at-grubhub-94db998a898a; see also: https://techcrunch.com/2019/12/03/aws-launches-managed-cassandra-services/ 54. Upon information and belief, the Grubhub Accused Instrumentalities comprises data centers housing memory devices, processing devices, receivers, and transmitters. On information and belief, such data centers are in Illinois, Texas, and Utah. See, e.g., Grubhub SEC Filing – 2014 Form S-1, available at: https://www.sec.gov/Archives/edgar/data/1594109/000119312514075544/d647121ds1.htm	
a memory device for storing at least one of work schedule information and scheduling information for at least one of an individual, an independent contractor, a temporary worker, and a freelancer;	Paragraph 54-56 of the Complaint: 54. Upon information and belief, the Grubhub Accused Instrumentalities comprises data centers housing memory devices, processing devices, receivers, and transmitters. On information and belief, such data centers are in Illinois, Texas, and Utah. See, e.g., Grubhub SEC Filing – 2014 Form S-1, available at: https://www.sec.gov/Archives/edgar/data/1594109/000119312514075544/d647121ds1.htm 55. The Grubhub Accused Instrumentalities comprise a memory device, which stores information regarding at least work schedule information and/or scheduling information for individual drivers in the Grubhub network, each of whom are, on information and belief, employed by Grubhub as Independent Contractors.	Grubhub



How to Work for Grubhub?

Grubhub delivery drivers are independent contractors working for, and paid by, Grubhub.

To work for Grubhub, you only need to fill out a Grubhub application. They'll look over your application, conduct a background check, and see if you're a good fit. If you're approved, you'll be granted access to their app to pick up orders in real-time as they arrive.

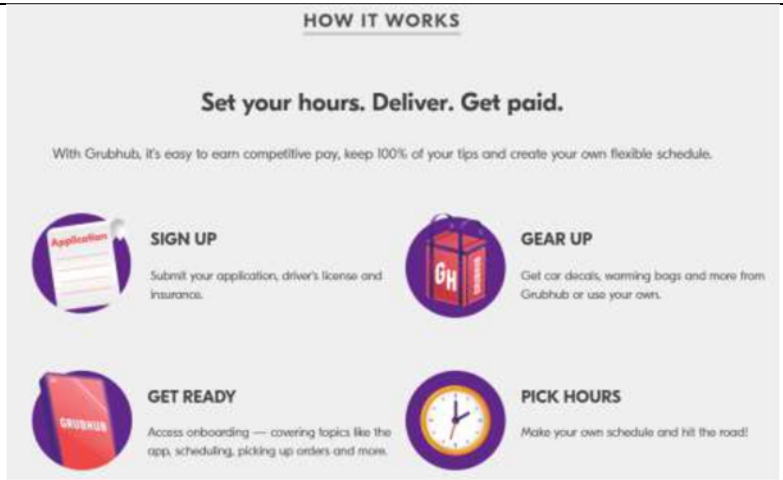
See https://www.lifewire.com/how-does-grubhub-work-4571012

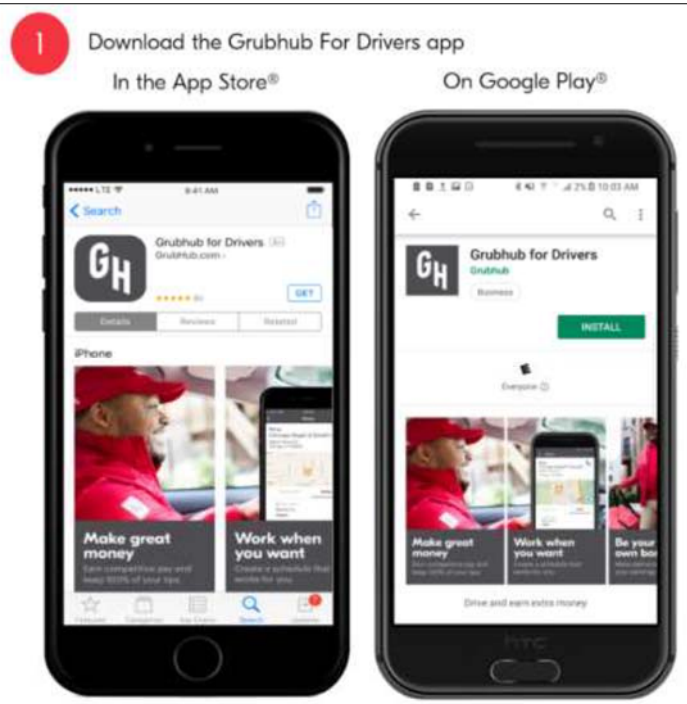
Of course, you're never stuck at these low average wages. Grubhub drivers are independent contractors, which means maximum earnings do not exist. By following our tips to increase Grubhub driver pay, you can consistently reach higher hourly averages and make a comfortable living with food delivery.

However, independent contractors are responsible for all job-related expenses, so don't forget to budget for gas, car maintenance, and similar needs.

See https://www.ridester.com/grubhub-driver/

56. The Grubhub Accused Instrumentalities store work schedule information for each such driver (independent contractor) by virtue of the driver's "Block Scheduling" selections on the Grubhub Driver App or, in the alternative, by virtue of the driver notifying Grubhub of his/her availability for engagement on an open assignment. Available Blocks are open on a first-come, first-served basis for drivers, although certain drivers with higher ranking will receive priority. Drivers who have formally signed up for a given block of time are given assignment priority for deliveries during the timeframe over otherwise available drivers.

	 *See* https://driver.grubhub.com/?utm_source=grubhub_webdinerapp&utm_medium=content_owned&utm_campaign=product_footer-link	

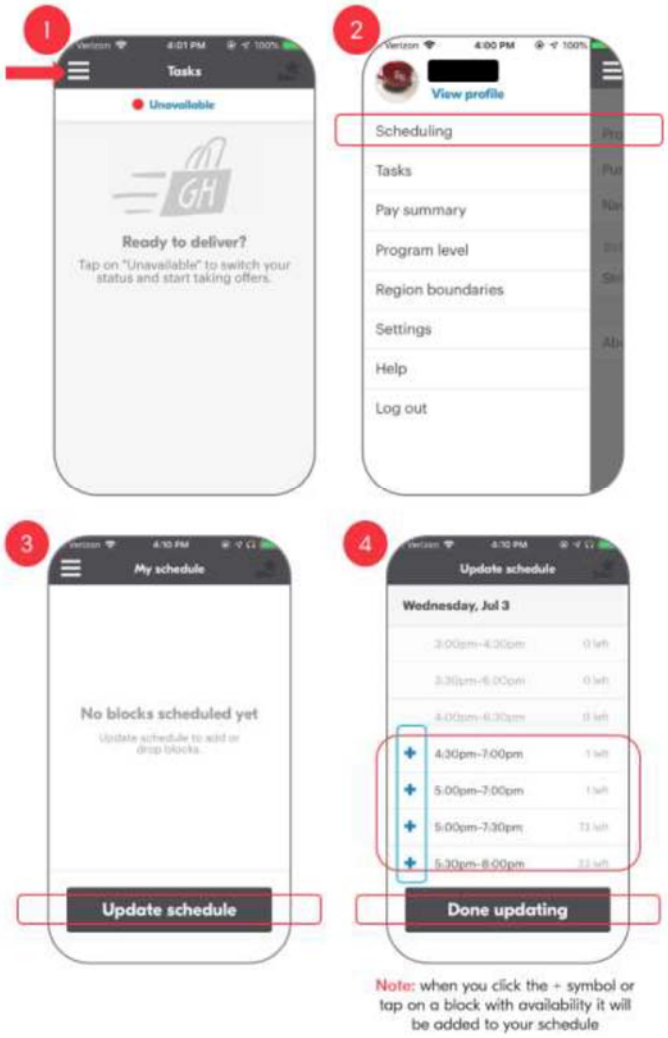


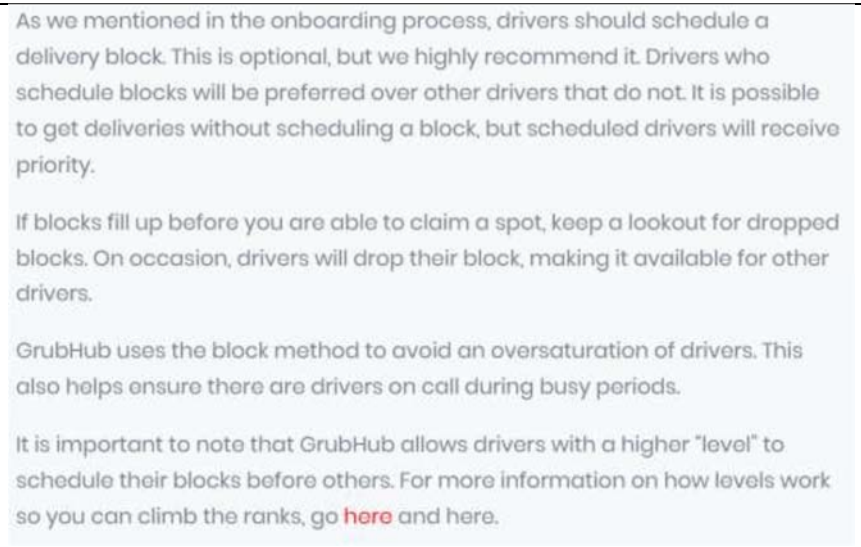
See https://driver-support.grubhub.com/hc/en-us/articles/360029378912-How-do-I-log-into-and-set-upmy-Grubhub-for-Drivers-app-

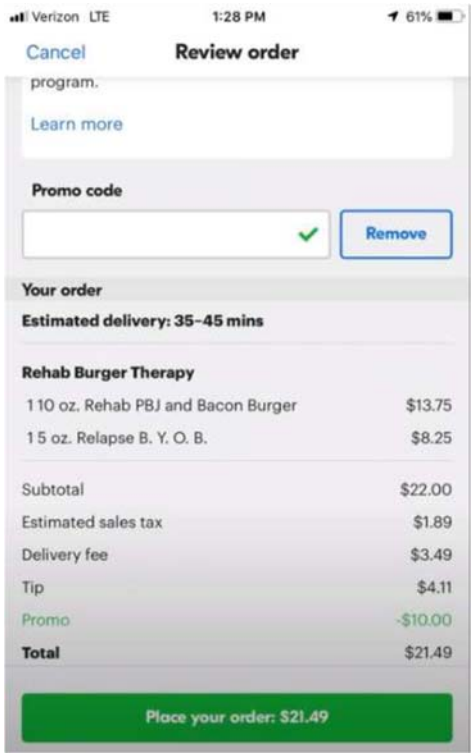
How Grubhub Works for Drivers

Just like drivers for any other food delivery service, Grubhub drivers have two primary responsibilities: picking up food from local restaurants and delivering it straight to customers. This process can be completed through the Grubhub for Drivers app.

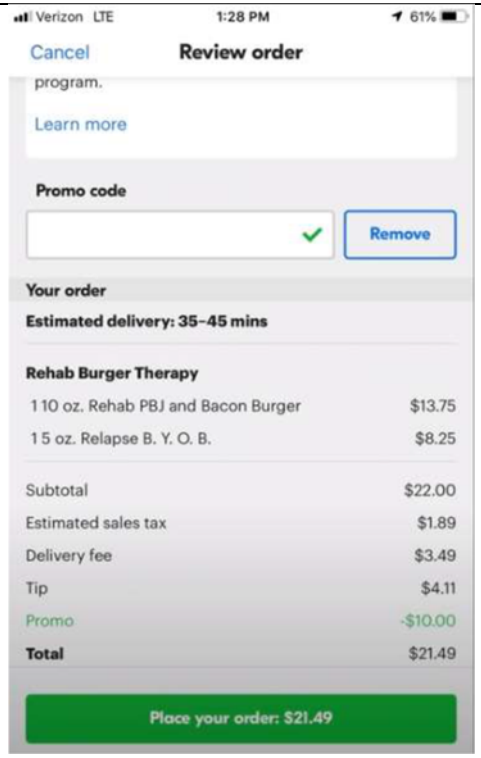
See https://www.ridester.com/grubhub-driver/

	• Available blocks will appear with a + symbol next to them • By tapping on the +, name, or time of an available block, it will be added to your schedule  *See* https://driver-support.grubhub.com/hc/en-us/articles/360029409472-How-do-I-sign-up-for-blocks	

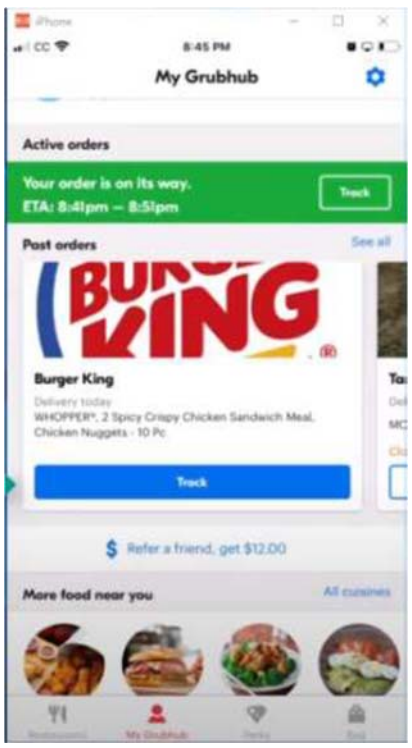
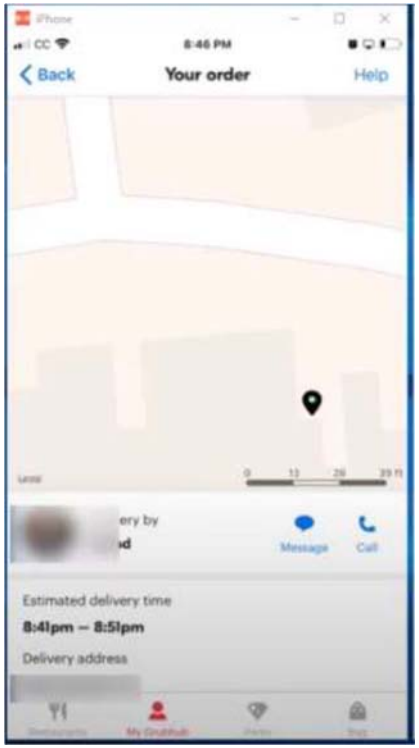
	 *See* https://www.ridester.com/grubhub-driver/	
a receiver for receiving a first request,	Paragraph 54 of the Complaint 54. Upon information and belief, the Grubhub Accused Instrumentalities comprises data centers housing memory devices, processing devices, receivers, and transmitters. On information and belief, such data centers are in Illinois, Texas, and Utah. See, e.g., Grubhub SEC Filing – 2014 Form S-1, available at: https://www.sec.gov/Archives/edgar/data/1594109/000119312514075544/d647121ds1.htm Paragraph 57 of the Complaint 57. The Grubhub Accused Instrumentalities comprise a receiver for receiving a first request from a communication device associated with a hiring entity (e.g., the user of the Grubhub Mobile App for Consumers and/or the user of the Grubhub web page at grubhub.com). On information and belief, when a user seeks to place an order using the Grubhub apparatus, a first request is generated to obtain the work schedule information for the known available independent contractors in	User (Grubhub mobile app and/or use of the Grubhub web page at grubhub.com)

	order to generate an Estimated Time for Delivery. If acceptable, the user has the option of placing the order and completing the transaction.  *See* Grubhub Customers Tracking Drivers In Real Time, available at: https://www.youtube.com/watch?v=pCHZIpzKSCk	
wherein the first request contains information regarding a request to obtain at least one of work schedule information		None

and scheduling information for the at least one of an individual, an independent contractor, a temporary worker, and a freelancer,		
wherein the first request is received from a first communication device associated with an employer or hiring entity;	Paragraph 57 of the Complaint 57. The Grubhub Accused Instrumentalities comprise a receiver for receiving a first request from a communication device associated with a hiring entity (e.g., the user of the Grubhub Mobile App for Consumers and/or the user of the Grubhub web page at grubhub.com). On information and belief, when a user seeks to place an order using the Grubhub apparatus, a first request is generated to obtain the work schedule information for the known available independent contractors in order to generate an Estimated Time for Delivery. If acceptable, the user has the option of placing the order and completing the transaction.	User (Grubhub mobile app and/or use of the Grubhub web page at grubhub.com)

	 *See* Grubhub Customers Tracking Drivers In Real Time, available at: https://www.youtube.com/watch?v=pCHZIpzKSCk	
a processing device for processing information contained in the first request,	<u>Paragraph 54 of the Complaint</u> 54. Upon information and belief, the Grubhub Accused Instrumentalities comprises data centers housing memory devices, processing devices, receivers, and transmitters. On information and belief, such data centers are in Illinois, Texas, and Utah. See, e.g., Grubhub SEC Filing – 2014 Form S-1, available at: https://www.sec.gov/Archives/edgar/data/1594109/000119312514075544/d647121ds1.htm	Grubhub

wherein the processing device generates a first message containing the at least one of work schedule information and scheduling information for the at least one of an individual, an independent contractor, a temporary worker, and a freelancer; and		None
a transmitter for transmitting the first message to the first communication device,	Paragraph 54 of the Complaint 54. Upon information and belief, the Grubhub Accused Instrumentalities comprises data centers housing memory devices, processing devices, receivers, and transmitters. On information and belief, such data centers are in Illinois, Texas, and Utah. See, e.g., Grubhub SEC Filing – 2014 Form S-1, available at: https://www.sec.gov/Archives/edgar/data/1594109/000119312514075544/d647121ds1.htm	Grubhub
wherein the receiver receives a second request,		None
wherein the second request contains information for at least one of	Paragraph 58 of the Complaint 58. On information and belief, when a user completes an order using the Grubhub Accused Instrumentalities, the order comprises a second request to engage and	User (Grubhub mobile app and/or use of the

reserving, engaging, and requesting, the services of the at least one of an individual, an independent contractor, a temporary worker, and a freelancer,	obtain the Grubhub Independent Contractor in the vicinity, and to thereafter receive delivery/status information. On information and belief, the Independent Contractors are notified via "push notification" when a new order is ready for delivery. Drivers are notified of available orders based on their proximity. If the initial driver does not timely respond by accepting the offer for delivery, it is passed to the next available driver for consideration. The second request is confirmed, and the user is then given the options to "Track My Order" and real-time mapping features, as well as by the "ETA" and order status indications on the Grubhub Consumer App.   *See* Track Your Grubhub Order, available at https://www.youtube.com/watch?v=pX-4shZ1PDM	Grubhub web page at grubhub.com)

See https://driver-support.grubhub.com/hc/en-us/articles/360030830171-How-do-I-use-the-Grubhubfor-Drivers-app-to-complete-deliveries-

How does Grubhub work for couriers?

Being a food delivery app, delivery is an essential part of the business. Grubhub has a network of couriers that pick up orders from the restaurants and deliver them to the consumers.

Let's understand how does Grubhub work for couriers

Step 1: That's an order

As soon as a restaurant confirms an order, the courier stationed nearest to the location is notified about the order. The courier has to accept the order if it is possible for him to reach in time.

Step 2: Pick Up

After accepting the delivery request, the courier has to reach the restaurant as soon as possible. Once he reaches he has to pick up the order and update the same in this application. This helps the user to track their orders while on the way.

See https://www.ncrypted.net/blog/how-does-grubhub-work/

	 See https://www.ncrypted.net/blog/how-does-grubhub-work/	

	Accepting Deliveries Once you schedule a delivery block, the next thing drivers need to do is get into position. GrubHub will not start sending you deliveries until you are in a predefined delivery zone. To identify where your delivery boundary is for your unique location, open the GrubHub app and click on the bars located in the upper right-hand corner, then select "View Region Boundaries". To start accepting orders, double-check that you are located in the delivery area and set your status to "Taking Offers". This can be done by tapping on "Unavailable". When the next screen pops up, slide the red dot from "Unavailable" to "Taking Offers". Now that GrubHub knows you are ready, offers will be sent to you based on your location. When an offer comes through, you will hear a cowbell. Once you do, a 90-second countdown will begin. If you do not accept the order within that time, it will be issued to another driver. Before you accept the offer, you can see the customer and restaurant location as well as your own. GrubHub will also show you are much you'll earn by accepting the order. *See* https://www.ridester.com/grubhub-driver/	
wherein at least one of the processing device processes the information contained in the second request and at least one of reserves, engages, and requests, the services of the at least one of an individual, an independent contractor, a		None

temporary worker, and a freelancer,		
the processing device generates a second message containing information regarding the second request,		None
and the transmitter transmits a second message containing information regarding the second request to a second communication device associated with the at least one of an individual, an independent contractor, a temporary worker, and a freelancer.		None